

UNITED STATES DISTRICT COURT

for the

Southern District of Georgia

United States of America

v.

Treamon Dominic Lacy

Case No.

4:23mj55-BKE

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 10, 2023 in the county of Liberty in the
Southern District of Georgia, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 641

Theft of Government Property

18 U.S.C. § 1361

Damage to Government Property

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet./s/ Jordan M. Poe*Complainant's signature*CID Special Agent Jordan M. Poe*Printed name and title*

Attested to by the applicant by video-teleconference in
 accordance with the requirements of Fed. R. Crim. P. 4.1.

Date: 07/10/2023

*Judge's signature*City and state: Augusta, GeorgiaBrian K. Epps, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT

I. INTRODUCTION

I, Jordan M. Poe, being a duly sworn and appointed Special Agent for the Department of Army Criminal Investigation Division (DACID), hereby make the following statement in support of the attached criminal complaint:

1. I am a federal law enforcement officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18 of the United States Code (U.S.C.).

2. I have been a Special Agent for five (5) months. I have training and experience in the enforcement of felony criminal laws of the United States. I currently serve as Special Agent at the Southeast Field Office, Fort Stewart, Georgia (FSGA). Prior to being a Special Agent, I served as a Diversion Investigator with the United States Department of Justice, Drug Enforcement Administration, Savannah District Office, Savannah, Georgia, for approximately four (4) years. I have a master's degree in business administration with a concentration in project management.

3. As supported by the facts and circumstances set forth below, there is probable cause to believe that on or about July 10, 2023, Treamon Dominic LACY (hereinafter the "subject"), committed the federal crimes of Damage to Government Property, in violation of Title 18, U.S.C. § 1361 and Theft of Government Property, in violation of Title 18, U.S.C. § 641.

4. LACY is male, date of birth May 7, 1984, standing approximately 6'3"

tall and weighing around 180 pounds. He has black hair, brown eyes, and a dark complexion.

5. The facts set forth below are based upon my personal observations, reports and information provided to me by other law enforcement officials and obtained records. I do not purport to set forth all of my knowledge of or investigation into this matter, but only to set forth sufficient facts for this Court to find that probable cause exists to believe the Defendant committed the alleged offenses.

II. STATUTORY AUTHORITY

6. Title 18, U.S.C. § 1361, Damage to Government Property and Title 18, U.S.C. § 641, Theft of Government Property.

III. FACTS AND CIRCUMSTANCES OF THE INVESTIGATION

7. On July 10, 2023, at approximately 9:55 a.m., Fort Stewart Military Police responded to an incident involving a HMMWV (also known as “humvee”) which had been driven through the front doors of Building 1 on Fort Stewart. Building 1 belongs to the United States Army. The subject was found being held down by another individual when FSGA Military Police (“MP”) arrived. Photos of the scene as observed are provided below:



8. At approximately 10:00 a.m. on the same date, I and several other DACID Special Agents arrived on scene. The subject was already detained by FSGA MPs. The subject stated that he wished to speak to someone at the DACID office.

9. Records checks revealed that the subject is a citizen of the United States.

Further records checks revealed the subject is a retired Army Staff Sergeant. Records checks of criminal history revealed prior arrests for Driving Under the Influence and Disorderly Conduct.

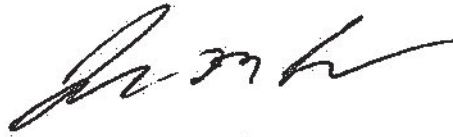
10. On the same date, DACID Special Agents reviewed CCTV Footage from inside Building 1 that showed the subject exiting the Humvee after it crashed through the Building 1's front doors. The subject did not have any right or authority to be driving the Humvee, which is property of the Federal Government. Estimated damages to Building 1 are over \$1,000. It was determined that the subject removed the Humvee from the 87 BSSB motor pool on Fort Stewart, Georgia. The Humvee is worth over \$1,000. Based on the mode and precision with which the Humvee was driven, I believe that the subject intentionally drove the Humvee into Building 1's front doors.

IV. CONCLUSION

11. Based upon the information outlined above, there is probable cause to believe that Treamon Dominic LACY committed the offenses of Damage to Government Property, in violation of Title 18, U.S.C. § 1361 and Theft of Government Property, in violation of Title 18, U.S.C. § 641.

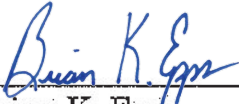
[Signatures Follow on Next Page]

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. M. Poe', written in a cursive style.

Jordan M. Poe
Special Agent

Sworn to by reliable electronic means, to wit: video-teleconference, pursuant to Fed.R.Crim.P. 4.1(b)(6) on July 10, 2023:

A handwritten signature in blue ink, appearing to read 'Brian K. Epps', written in a cursive style.

Brian K. Epps
United States Magistrate Judge
Southern District of Georgia